

Written Statement in response to the following:

Skerningham strategic site allocation (policy H10)

Question 4.5 – Is the proposal in Policy H10 for the development of up to 4,500 dwellings; a neighbourhood centre; two primary schools, a secondary school, and other community facilities; roads and other transport infrastructure; and a network of green and blue infrastructure on 487 hectares at Skerningham justified?

In particular:

a) would the development be suitably located in terms of policy SH1?

- Policy SH1 still includes the Northern Link Road
- In relation to SH1 para 4.0.7 Policy H10 is remote to the Town centre Fringe and therefore not key to delivering the vision for Darlington. Skerningham is not highly accessible and the development will not enable the issues of local pockets of deprivation, poor housing and environmental quality to be tackled comprehensively.
- Policy SH1 para 4.0.8 contradicts para 4.0.7 in stating that the urban fringe is the most suitable and sustainable.
- SH1 para 4.0.8 also states that it is only sustainable if appropriate community infrastructure and sustainable transport provision is made. Policy H10 does not make it clear what appropriate community infrastructure and sustainable transport provision **will** be made – rather that it will be sorted out during the planning process.
- Heritage Assets have been identified in Policy H10 (para 6.10.10 to 6.10.13). Policy SH1 para 4.0.5 states that development should not prejudice heritage or nature.
- Given the above Whinfield residents Association do not believe that the Council has provided sufficient evidence that the development is suitably located in terms of Policy SH1

b) Is there a reasonable prospect that the site will be available and could be viably developed at the point envisaged

- We consider Darlington's housing market to be relatively fragile due to its location and economy and will be swamped by large scale residential allocations through the Skerningham and other proposed Urban Extensions during the Plan period. This will almost certainly

prejudice the delivery rate of these sites within the lifetime of the plan and could also reduce the Council's five year housing supply.

- Para 1.27 of Skerningham Estates response to M1 suggests that the delivery of 4,500 homes should extend another 15yrs after the plan period ends in 2036 and that further infrastructure contributions will be required to support this.
- Skerningham Estate's response to M1 as stated in M1 Appendix pg 22 para 7.13.1 states that the viability appraisal makes provision within the plan period for a primary access road, bridge across the railway, a neighbourhood centre with a convenience store, a health centre and a 2-form entry primary school. Policy H10 indicates that much more than this will be provided including another primary school and a secondary school. If this is not deliverable within the Plan period then it should be removed from the Plan. Is Skerningham still feasible if these community facilities are not going to be made available?
- According to Skerningham's response to M1 contained in their M1 Appendix this scheme is envisaged to be 17.49% GDV profitable, including the assumptions with regards to affordable housing and the infrastructure requirements. Planning practice suggests that a profit of 15-20% GDV is acceptable. There is therefore a real risk that should extra costs be incurred, in particular in relation to the primary access road and the bridge over the mainline railway that this scheme will fall below 15% profitability. This could jeopardise the availability of the site as described in Policy H10. If no road is forthcoming the impact on local infrastructure networks would be severe as they are already (as the Council have recognised in various transport assessments in the past) near to full capacity.
- Para 6.1.4 Appendix of Skerningham Estate's response to M1 says that the land required for the Skerningham development is not in single ownership but that Skerningham Estates owns 60%. We are also aware that the Council also owns a significant proportion of this land (which in terms of objectivity doesn't really sit well because the Council will favour this development if they have an interest). However, there is a risk that not all landowners will ultimately sell the land identified, and hence a risk that the site might not be developed as envisaged.
- Referring back to profitability – if landowners require higher yields for their land, profitability will fall and deliverability at the point envisaged questionable.
- We would also note that part of the proposed Skerningham site (referred to as Muscar House Farm just off Barmpton Lane) owned by the Council has been put forward for development since at least 2010 and has been opposed vehemently by local residents. Prior to this Local Plan the land was included in the Making & Growing Places Plan of 2014 which was subsequently scrapped by the Council. This

particular land has also been the subject of a judicial review which has resulted in it remaining undeveloped.

- Muscar House Farm was deemed suitable for a development of approx 150 houses due to its potential impact on traffic on Barmpton Lane. It is interesting to note that this Plan will enable the building of 600 houses with the main access route being Barmpton Lane, significantly in excess of the Making and Growing Places Plan which the Council scrapped.

c) Subject to the modifications proposed by the Council, would the requirements of Policy H10, along with other relevant policies in the Plan, be effective in achieving sustainable development on the site having regard to NPPF 72?

- Policy H10 para 6.10.10 requires an internal distributor road but says this will be determined in the planning application process, not in the Plan. NPPF 72 states that housing developments of this size should be supported by the necessary infrastructure.
- Para 7.13.1 mentioned above states that 600 dwellings could be delivered before the construction of any roads with these 600 dwellings taking access from Barmpton Lane, a residential road which turns into single track.
- Council Studies have shown an increase of 3,697 vehicles a day or 179.4% on Barmpton Lane up to 2030 before the construction of any roads associated with Skerningham. This is not the necessary infrastructure to support this housing development and the necessary infrastructure should be put into place prior to development.
- According to Appendix M1 of Skerningham Estate's response para 7.13.1 the completion of the crossing over the ECML railway would coincide with the occupation of the 1350th dwelling. So the majority of the proposed housing allocation will be built before the necessary infrastructure as per NPPF72 will be in place.
- Given that a primary school is not proposed to be in place until completion of the 450th dwelling and a health centre will not be in place until the completion of the 630th dwelling it is highly likely that people will have to travel to access these services, and they will have to travel further than just Whinfield as the provision of these services in Whinfield is already under pressure. With Barmpton Lane proposing to be the main access route, this will place additional strain on the local road network, increase congestion and ultimately increase pollution levels for local residents.

- NPPF 72 para (a) talks about net environmental gains – Policy H10 makes no reference to any gains, in fact it's remoteness to the centre and reliance on car use would suggest there are none.
- NPPF 72 para c states that clear expectations should be set out for such large scale developments as in Policy H10. Policy H10 is all subject to planning applications, in our view although Policy H10 mentions such expectations they are not clearly set out and subject to agreements with developers during the planning application process.
- NPPF 72 suggests that Local Authorities should work with the support of their communities – this development, and indeed certain parts of this development have attracted local community opposition since the early 2000's.
- Amended wording of Policy H4 should also apply to Policy H10 to ensure that it meets the requirements of NPPF72 in terms of para C.

d) Does paragraph 6.10.10 need to be modified with regard to the reference to a northern link road? Is the designation of a northern link road on the key diagram (map1) AND THE Skerningham masterplan framework (figure 6.1) justified

-Yes. If the Skerningham Development is totally independent and not in any way reliant on the northern link road then any references to it in the Plan should be removed. To continue to include it in any shape or form would give the public the wrong impression and would question both the soundness and justification of the Plan.

- Interesting to note that the Statement of Common Ground between Darlington Borough Council and Highways England still makes reference to the northern link road and states that it could 'offer mitigation benefits' and will be 'kept under review'.

Question 4.6 - Are the assumptions in the housing trajectory (Appendix A) about the Skerningham strategic site justified, including that 1,650 dwellings will be completed by 2036? Has the Council provided clear evidence that development will begin in 2024 and that 90 dwellings will be completed by 2025?

- The Draft Local Plan is entirely over reliant on the allocation of large strategic allocation sites focussing delivery in and around Darlington through large scale Urban Extensions with no existing infrastructure in place. The predicted delivery rates for Skerningham (as set out at Appendix A of the Draft Local Plan) are ambitious and realistically undeliverable due to the amount of work that would be required and the timescales for undertaking this work at the preplanning, planning and lead in stages of large strategic sites. Additionally, Skerningham is a predominantly Greenfield site and has significant infrastructure

requirements that would need to be met before any housing was delivered. We therefore consider that the delivery rate timescales provided in Appendix A of the Draft Local Plan for Skerningham are overly ambitious and not deliverable.

- In addition to this, and perhaps to support the complexities and amount of work that would be required for the planning of this site, the Council did say that summaries of the site specific viability assessments would be published by the end of March 2021. It then said that these would be published in the week commencing 19th April 2021. As of 27th April 2021 these are still outstanding, which would lead us to question the feasibility of 1,650 dwellings being completed by 2036 if a summary site assessment cannot be provided by the 2 dates the Council has said it would be. We would therefore say that no clear evidence has been provided by the Council to suggest that development will begin in 2024.

- The site is subject to a comprehensive masterplan which will only be agreed as part of the planning application process and is therefore subject to further scrutiny which could delay any such dwellings being completed by 2036. Policy H10(g) will also only be considered at the planning application stage. This is an integral part of the sustainability of Policy H10 in relation to transport links and as the Council have not been able to evidence this as an absolute requirement of Policy H10, if not agreed with developers as part of the Local Plan, could affect the housing trajectory.

Elm Tree Farm housing allocation (ref 392)

Q4.9. Is the proposed Elm Tree Farm housing allocation, with an indicative yield of 150 dwellings, justified? In particular:

- a) Would the development be suitably located in the context of policy SH1?**
- b) Would the requirements of appendix B, along with relevant policies in the Plan, be effective in achieving sustainable development on the site?**
- c) Are the assumptions in the housing trajectory (appendix A) about the site justified, including that that 150 dwellings will be completed by 2036? Has the Council provided clear evidence that development will begin in 2022 and that 90 dwellings will be completed by 2025?**

- Please see comments made in Question 4.1 in relation to Policy SH1 and remoteness to the Town Centre Fringe and therefore not key to delivering the vision for Darlington.

- We would also query the sustainable transport element of this development in so far as it does not address the needs of people with

disabilities and reduced mobility in so far as the nearest bus stop is over 400m away and local services over 600m away.

- There is no provision in the Elm Tree Farm allocation for additional school or health services and with these services already at full capacity within the Whinfield ward this will place a strain on local services and will increase car journeys as people will need to travel by car for school and healthcare provision.
- Darlington have already acknowledged that there is a need for affordable housing for older people, yet this development is predominately made up of 3-4 bedroomed houses which do not therefore support Darlington's need.
- Given the distance from employment, the town centre and the nearest bus stops, this development is highly likely to increase traffic and strain on the already near to capacity A1150. It will also undoubtedly increase traffic congestion and pollution in the Whinfield area.